

CHARLES WALLSHEIN

Attorney at Law

35 Pinelawn Road

Suite 106 E

Melville, New York 11747

cwallshein@wallsheinlegal.com

Tel: 631 824-6555

Fax: 631 824-6558

March 18, 2019

United States Bankruptcy Court
for the Eastern District of New York at Central Islip
The Honorable Alan S. Trust
290 Federal Plaza
Central Islip, NY 11722

Re: In Re; Joann Kolnberger, Chapter 13, Case No. 18-75904-ast
Adversary Proceeding No. 19-8021, Request for enlargement of time to
serve and file opposition. [Bank of America]

Dear Judge Trust,

Plaintiff respectfully requests a one-week enlargement to March 25, 2019 to serve and file opposition and objection to Defendants Bank of America's motion to dismiss the complaint in the above referenced adversary proceeding. Plaintiff's objections are due to be served no later than today, March 18, 2019.

The adversary proceeding concerns three defendants that at one time or another during the loan history either owned and or serviced the Plaintiff's mortgage loan. The claims are brought pursuant to Regulation X, fraud, NYGBL §349 and NYCPLR §3408. The two motions to dismiss involve complex doctrines of law. Defendant has also this day filed a notice of presentment of motion to amend the complaint together with an amended complaint that adds new causes of action and refines the pleadings in general.

I did not have an opportunity to contact opposing counsel, Winston & Strawn to obtain counsel's consent. Plaintiff thanks the Court for its courtesy and attention to this matter.

Very truly yours,
/S/ Charles Wallshein